

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

LENWARD SMITH)
)
 Plaintiff,)) CIVIL ACTION
)) FILE NO. CV410-274
 v.))
 PROFIT SERVICES GROUP, LLC AND)
 DAVID FREITAG)
)
 Defendants.)

MOTION FOR DEFAULT JUDGMENT

Plaintiff hereby moves for default judgment against Defendants, Profit Services Group, LLC and David Freitag. Defendant Profit Services Group, LLC was served with Plaintiff's amended complaint on December 10, 2010. *See Exhibit A.* Defendant David Freitag was served via personal service on March 1, 2011. *See Exhibit B.* Defendants have offered no explanation for their failure to answer the instant complaint. Accordingly, Plaintiff seeks default against Defendants in the amount of seven thousand forty eight dollars and forty cents (\$7,048.40), representing statutory damages in the amount of one thousand dollars (\$1,000.00), 15 U.S.C. §1692(k)(a)(2)(A), five thousand three hundred twenty three dollars and fifty cents (\$5,323.50) in attorney fees and seven hundred twenty four dollars and ninety cents (\$724.90) for court costs.

This sum is supported by the Affidavit of undersigned, attached hereto as Exhibit C.

Dated: April 21, 2011

ATTORNEYS FOR PLAINTFF
LENWARD SMITH

Respectfully submitted,

/s/ Dennis R. Kurz
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Filed electronically on this 21st day of April, 2011, with:

United States District Court CM/ECF system

s/Kimberly Larson
Kimberly Larson